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8 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

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10 In the Matter of: ) Case Number 12-42882  
11 Hamza Husnain Jafri ) Chapter 13  
12 Rizwana Babar Jafri ) Motion to Avoid Judicial Liens of Citibank  
Debtors ) (South Dakota) N.A. Against Debtors' Real  
Property

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14 Debtors Hamza Husnain Jafri and Rizwana Babar Jafri, commenced this case on  
15 03/30/2012 by filing the above named petition for relief under Chapter 13 of Title 11 of the  
16 United States Code.

17 This motion is filed pursuant to 11 U.S.C. §522(f)(1)(A) to avoid and cancel three  
18 judicial liens held by Citibank (South Dakota) N.A. on real property located at 2346 Del  
19 Monte Dr. San Pablo, CA 94806. The three judgment liens are recorded in Contra Costa  
20 County as follows:

- 21 1. Document No: 2011-0168038-00, recorded 8/17/2011 for \$6,877.57. [Exhibit D]  
22 2. Document No: 2011-0184601-00, recorded 9/8/2011 for \$4,037.89. [Exhibit E]  
23 3. Document No: 2011-0200531-00, recorded 9/28/2011 for \$3,078.06 [Exhibit F]

24 This motion is based on the Declaration of Debtors, a Memorandum of Points and  
25 Authorities, Exhibits attached to the Motion, and Schedules filed with the court in this case.

26 Based on the formula laid out in §522(f)(2)(A) each of the three judgment liens of  
27 Citibank (South Dakota) N.A. may be avoided as each of them individually impair the  
28 §703.140(b)(1) homestead exemption to which the Debtors are entitled because the sum of the

1 liens and exemption is greater than Debtors' interest in the property would be in the absence  
2 of any liens.

3 WHEREFORE, Debtors pray for an order against Citibank (South Dakota) N.A. to  
4 avoid the three above named judicial liens recorded in Contra Costa County on Debtors' real  
5 property located at 2346 Del Monte Dr. San Pablo, CA 94806.

6 Dated: May 7, 2012

/s/ Andrew Christensen

7 Andrew Christensen

8 Attornev for Debtors  
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